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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING**

|                      |   |                    |
|----------------------|---|--------------------|
| WESLEY DALE VINCENT, | ) |                    |
|                      | ) |                    |
| <i>Plaintiff,</i>    | ) | Case No 16-CV-270J |
|                      | ) |                    |
| v.                   | ) |                    |
|                      | ) |                    |
| AVA NELSON           | ) |                    |
|                      | ) |                    |
| <i>Defendant.</i>    | ) |                    |

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**PLAINTIFF'S PROPOSED JURY INSTRUCTIONS**

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Plaintiff, by and through the undersigned counsel, hereby submit the following Proposed Jury Instructions.

| #    | Title   | Stip'd | Plf. Objects | Def. Objects | Ruling |
|------|---|--------|--------------|--------------|--------|
| 1.01 | Informing the Panel Prior to Voir Dire        |        |              |              |        |
| 1.02 | General Instructions Before Opening Statement |        |              |              |        |

|       |   |  |  |  |  |
|-------|---|--|--|--|--|
| 1.02A | Jurors Will Be Permitted to Take Written Notes During the Course of the Trial |  |  |  |  |
| 1.02B | Deposition Testimony  |  |  |  |  |
| 1.02C | Direct and Circumstantial Evidence  |  |  |  |  |
| 1.02D | Expert Testimony  |  |  |  |  |
| 1.02E | Opinion Testimony by Lay Witness  |  |  |  |  |
| 1.02F | Jurors Not to Consider Insurance  |  |  |  |  |
| 1.02G | Written Questions by Jurors for Witnesses Permitted                           |  |  |  |  |
| 1.03  | General Instructions Before Final Argument                                    |  |  |  |  |
| 1.04  | Duty as a Juror   |  |  |  |  |
| 2.03  | Preponderance of Evidence - Definition  |  |  |  |  |
| 3.01  | Burden of Proof, modified   |  |  |  |  |
| 3.02  | Definition of Willful and Wanton Misconduct, modified                         |  |  |  |  |
| 3.04  | Cause - Defined   |  |  |  |  |
| 4.01  | Measure of Damages – Personal Injury  |  |  |  |  |
| 4.02  | No Evidence of Dollar Estimate Required                                       |  |  |  |  |
| 4.04  | Injured Party – Life Expectancy   |  |  |  |  |
| 4.05  | Present Value of Future Losses – Economic Condition                           |  |  |  |  |
|       |   |  |  |  |  |
|       | <b>NON-PATTERN INSTRUCTIONS</b>   |  |  |  |  |
|       | Willful and Wanton Misconduct- Additional Standard                            |  |  |  |  |
|       |   |  |  |  |  |
|       | Verdict Form  |  |  |  |  |

Respectfully submitted this 18th day of October, 2019.

**METIER LAW FIRM, LLC**

s/Tom Metier  
T. Tom Metier, Esq.

### **CERTIFICATE OF SERVICE**

I hereby certify that on this 18<sup>th</sup> day of October, 2019 a true and correct copy of the foregoing was served via the Court's CM/ECF system upon the following:

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s/Janie Sanchez  
For Metier Law Firm